



THE CITY OF NEW YORK
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November 20, 2023

By ECF

Honorable Jesse M. Furman
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Debellis v. 48th Precinct Detective Nash et al.
19 Civ. 8730 (JMF)

Your Honor:

I am a Senior Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York and the attorney representing defendants Andrew Nash and James Flynn in the above-referenced matter. Defendants write to respectfully request an eleven-day extension of time, from November 24, 2023 until December 5, 2023, for defendants to serve their motion to enforce. This is the first request of this kind and plaintiff *pro se* Anthony F. Debellis consents to this request.

As the Court is aware, on October 24, 2023, Your Honor set a briefing schedule setting the deadline for the defendants to file their motion to enforce settlement within thirty days of the Order; plaintiff to file his opposition within 30 days thereafter; and for defendants to file their reply within two weeks of the filing of plaintiff's opposition.

The reason for the instant request is due to a number of pressing deadlines the undersigned is currently handling, including motion practice previously scheduled in other matters, additional time is needed to sufficiently prepare defendants' papers. Should the Court be inclined to grant this request, defendants respectfully submit the following proposed amended briefing schedule:

- December 5, 2023: Deadline for defendants to serve and file defendants' motion to enforce;
- January 4, 2023: Deadline for plaintiff to serve and file his opposition;
- Two weeks from receipt of plaintiff's opposition: Deadline for defendants to serve and file their reply.

For these reasons, and in light of limited availability this week due to Thanksgiving, defendants respectfully requests an 11-day extension of time, from November 24, 2023 until December 5, 2023, to serve and file defendants' motion to enforce and a corresponding extension of time for the remaining motion papers as set forth above.

Thank you for your consideration herein.

Respectfully submitted,

/s/ Inna Shapovalova

Inna Shapovalova
Senior Counsel
Special Federal Litigation Division

cc: **BY FIRST CLASS MAIL**
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Plaintiff pro se
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Application GRANTED. The Clerk of Court is directed to terminate ECF No. 102 and mail a copy of this Order to Plaintiff.

SO ORDERED.

A handwritten signature in black ink, appearing to be "Jan [unclear]", written in a cursive style.

November 20, 2023